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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	CC Docket No. 97-149
1997 Annual Access Tariff Filings	)	CCB/CPD 98-1

COMMENTS OF U S WEST COMMUNICATIONS, INC.

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January 21, 1998

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SUMMARY

In these Comments, U S WEST Communications, Inc. joins Bell Atlantic and the SBC Companies in asking the Commission to reconsider the Memorandum Opinion and Order in this matter. We believe the Commission erred by prescribing a BFP for several LECs (including U S WEST) to use in allocating their Common Line basket between CCL charges and EUCL charges. Specifically, we demonstrate that, in light of currently-available information, the methodology adopted by the Commission produced a forecast of U S WEST's per line BFP that is no more accurate than U S WEST's forecast.

But even if the Commission's BFP prescription was not error, its decision to order refunds cannot withstand scrutiny. Applicable Commission and Court of Appeals precedent requires the Commission to balance the interests of the ratepayer and the carrier in determining whether to require refunds, something the Commission wholly failed to do in this case. We lay out a number of considerations that would militate toward a determination not to order refunds. When the Commission does undertake that analysis, we believe it will inevitably conclude that refunds are not justified.

Finally, U S WEST fully supports SBC's request that the Commission reconsider its requirement of an "R" adjustment to the exogenous cost change to remove the effects of equal access cost recovery. SBC is correct in arguing that the Commission has failed to justify its departure from prior practice and thus must reconsider its decision in this regard.

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U S WEST Communications, Inc. ("U S WEST") submits these Comments on the Petitions for Reconsideration filed in this proceeding by Bell Atlantic Telephone Companies ("Bell Atlantic") and the SBC Companies ("SBC").[1]

I. THE COMMISSION SHOULD RECONSIDER ITS PRESCRIPTION OF BASE FACTOR PORTION AND ITS DECISION TO REQUIRE REFUNDS

A. The Commission Erred By Prescribing The Base Factor Portion

Bell Atlantic's Petition argues that the Federal Communications Commission ("Commission") erred by prescribing the Base Factor Portion ("BFP") for several local exchange carriers ("LEC"); by requiring these LECs to recalculate their End User Common Line ("EUCL") charges, Carrier Common Line ("CCL") charges and Presubscribed Interexchange Carrier Charges ("PICC") for the 1997-98 tariff year based on that BFP prescription; and by ordering these LECs to refund the amounts they over-collected for CCL charges.

[1] See Petition for Reconsideration of Bell Atlantic, filed herein Dec. 31, 1997 and Petition for Reconsideration of the SBC Companies, filed herein Dec. 31, 1997. In the Matter of 1997 Annual Access Tariff Offerings, CC Docket No. 97-149, Memorandum Opinion and Order, FCC 97-403, rel. Dec. 1, 1997 ("Memorandum Opinion and Order"). See also Public Notice, Bell Atlantic and the SBC Companies

U S WEST fully supports Bell Atlantic's arguments and analysis as to the impropriety of this prescription. In support of its argument, Bell Atlantic demonstrates that the Commission's forecasting methodology is no more accurate than was Bell Atlantic's, and probably less so. U S WEST's analysis lends support to this argument; it indicates that the Commission's forecast of U S WEST's per line BFP was no more accurate than U S WEST's.

Attachment 1 to these Comments is a replication of the autoregression methodology employed by the Commission, with an added data point for 1997; the 1997 per line BFP is based on actual results for eleven months, projected to year's end. It shows that U S WEST's per line BFP flattened out in 1997, growing only slightly to $6.85 (from $6.81 in 1996). As a result, the updated autoregression projects a BFP of $7.01 for 1998, and $6.93 for tariff year 1997-98, $.45 lower than the Commission's estimate of $7.38 (and $.37 higher than U S WEST's estimate of $6.56).[2]

Attachment 2 is another autoregression, with two additional data points, the actual per line BFP for 1989 and 1990. With these additional data, U S WEST's BFP per line for the 1997-98 tariff year projects to $6.96.

U S WEST does not offer these as valid projections of its per line BFP for the tariff year 1997-98. Indeed, they demonstrate the fallacy of using an autoregression to make such a projection at all. That method works well so long as the past

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Petition the Commission for Reconsideration in the 1997 Annual Access Tariff Filings, DA 98-16, rel. Jan. 6, 1998.

[2] The results have been adjusted to reflect the pay telephone and other billing and collection adjustments.

accurately predicts the future. But the additional data presented here indicate that this is not the case with U S WEST's BFP. Taking into account the 1989-90 and 1997 data, the consistent growth demonstrated from 1991 through 1996 is not so clearly an accurate predictor of U S WEST's future BFP as the Commission's analysis would have suggested.[3]

Indeed, if U S WEST's actual per line BFP for 1997 comes in at or near its current projection ($6.85), attaining the Commission's projection for the 1997-98 tariff year ($7.38) would require the 1998 BFP to grow to the neighborhood of $7.90 -- growth of more than a dollar. From 1989 through 1996, U S WEST's per line BFP grew from $5.47 to $6.81, an average of about 19 cents per year;[4] it has never grown by more than 40 cents in any year. The chances that per line BFP will grow by a dollar or more in 1998 are negligible.

Whatever its merit in other settings, autoregression analysis has little or no value in estimating U S WEST's per line BFP. The Commission plainly erred by relying on that method to project U S WEST's BFP, and it should reconsider its decision prescribing the LECs' per line BFP on that basis.

B. The Commission Erred By Ordering Refunds

Bell Atlantic also argues that the Commission erred by ordering refunds because it did not provide the LECs an opportunity to recoup the moneys refunded;

[3] The Commission's autoregression model has a slope coefficient greater than one (approximately 1.06), indicating instability. The small sample size further calls into question the validity of the autoregression.

[4] Including U S WEST's current projection for 1997, the growth has averaged a bit over 17 cents per year.

the Commission thereby required the affected LECs to price below the cap for the Common Line basket, in violation of its own price cap rules.[5]

U S WEST agrees with Bell Atlantic. Moreover, the Commission erred by ordering refunds without considering the full circumstances of the situation.

Section 204(a) of the Communications Act empowers the Commission to suspend and investigate filed tariffs; at the conclusion of that investigation, the Commission "may" order refunds of the amounts it finds not to be justified. In considering whether to order refunds, the Commission exercises its discretion:

> [R]efunds are largely a matter of equity, and in arriving at a decision as to whether or not refunds should be awarded, we must balance the interests of both the carrier and the customer in determining the public interest. In addition, each case must be examined in light of its own particular circumstances.[6]

Refunds are not presumptively appropriate[7] and a decision to order them must be supported by substantial evidence.[8]

In the Memorandum Opinion and Order, the Commission made no effort to consider the relative interests of the affected carriers and their customers. The Commission simply ordered the affected LECs to recalculate their EUCL and CCL

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[5] Bell Atlantic Petition at 4.

[6] In the Matter of American Television Relay, Inc., 67 FCC 2d 703, 708-9 ¶ 15 (1978). Cf., Las Cruces TV Cable v. FCC, 645 F.2d 1041, 1047 (D.C. Cir. 1981) ("the standard of review of an agency refund order is whether the agency decision is equitable in the circumstances of this litigation.") (internal quotation omitted).

[7] Towns of Concord, Norwood, & Wellesley v. FERC, 955 F.2d 67, 75 (D.C. Cir. 1992) ("Customer refunds are a form of equitable relief, akin to restitution, and the general rule is that agencies should order restitution only when money was obtained in such circumstances that the possessor will give offense to equity and good conscience if permitted to retain it.") (internal quotation omitted).

[8] Las Cruces TV Cable, 645 F.2d at 1047.

charges and make refunds to the interexchange carriers ("IXC") operating in their region.[9] This plainly does not meet the requirements the courts and the Commission itself have established for requiring refunds, and the Commission must reconsider its decision.

In determining whether to order refunds, the Commission should consider at least the following:

- **No windfall to the LECs.** The issue here involves the allocation of an unchallenged revenue requirement; it is not a matter of the LECs' overearning.[10] To be sure, the Commission determined that the LECs had overcharged the IXCs, but those overcharges were offset by undercharges to multi-line business customers. The Memorandum Opinion and Order speculates that the LECs could overearn by skewing the allocation toward the CCL, so long as the growth in access minutes in the tariff year exceeds one-half the growth in the base year. Though this could happen, the effect is minimal. If U S WEST's CCL and EUCL rates for the second half of 1997 had reflected the per line BFP prescription ordered by the Commission, its multi-line business EUCL revenues would have increased by approximately \$20.889 million, while its CCL revenues would have declined by \$20.995 million.[11] The effect of the allocation on U S WEST's overall revenues was

[9] Memorandum Opinion and Order ¶ 84.

[10] Id. ¶ 22.

[11] Attachment 3 details the calculation, showing the number of multi-line business EUCL charges U S WEST actually imposed (by state) during the period, the incremental amount required to bring the EUCL to the Commission-prescribed

thus about $106,000, a trivial sum in this context. If this is the problem, to order a refund of the entire over-allocation to CCL -- the solution adopted by the Memorandum Opinion and Order -- is grossly disproportionate to the "windfall" gained by the LECs.[12]

- **The change from prior practice.** The Commission's rules have required price cap LECs to forecast their BFP since the inception of price caps. The rules do not specify any specific method for this, and the LECs have historically used a variety of methods. U S WEST has always based its forecasts on the budgets it uses to manage the business. Though the Commission's analysis finds those forecasts wanting, in six prior Annual Filings it allowed the rates developed from those forecasts to go into effect. The LECs, including U S WEST, have asked the Commission to utilize historic data, rather than forecasts, to set these rates in order to avoid the uncertainty of forecasts.[13] Bell Atlantic indeed requested Commission guidance in the course of this very proceeding.[14]

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level in each state, and the incremental revenue U S WEST would have obtained by having its multi-line EUCL charge at the Commission-prescribed level. The Attachment also shows total access minutes of use, the increment necessary to reduce the CCL charge to the Commission-prescribed level, and the resulting overbilling.

[12] Cf., In the Matter of Exchange Network Facilities for Interstate Access, Memorandum Opinion and Order, 1 FCC Rcd. 618, 628 ¶ 68 (1986) ("[I]n order to award refunds for discriminatory rates, equitable principles require consideration of whether the carrier was unjustly enriched by the discriminatory rates.").

[13] See, e.g., Comments and Opposition of U S WEST, Inc., CC Docket Nos. 96-262, et al., filed Aug. 18, 1997 at 13-14; and see, U S WEST Direct Case, CC Docket No. 97-149, filed Sep. 2, 1997 at 4-5.

[14] Bell Atlantic Petition at 5-6.

We believe the Commission erred by prescribing rates in this fashion, but even if it did not, it should take into account this sudden change from prior practice in deciding whether to order refunds. This situation closely resembles a proceeding in which the Commission considered whether to order Comsat to pay refunds, after finding it had earned in excess of the Commission-prescribed rate of return.[15] Comsat had filed a series of tariffs explicitly targeted to earn above the prescribed rate of return, and the Commission had allowed those tariffs to go into effect. The Commission declined to order refunds, in part because its inaction had led Comsat to assume the Commission was no longer enforcing the rate of return prescription.[16] Again, the Comsat proceeding involved overearnings: the Commission declined to require refunds, even though it thereby allowed Comsat to retain earnings in excess of the prescribed rate of return. By contrast, this proceeding involves only the allocation of an unchallenged revenue requirement.

- **The inaccuracy of the Commission's forecasts.** Bell Atlantic (in its Petition) and U S WEST (above) have demonstrated that the Commission's own methodology does no better a job of forecasting per line BFP than the

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[15] In the Matter of Communications Satellite Corporation, Memorandum Opinion and Order, 3 FCC Rcd. 2643 (1988).

[16] Id. at 2646 ¶ 22; cf., Virgin Islands Telephone Corp. v. FCC, 989 F.2d 1231 (D.C. Cir. 1993) (holding the Commission erred by ordering a refund of interim rates that produced excessive earnings in a six-month period when its practice was to evaluate earnings over a two-year period; the carrier had been expressly advised that the interim rates were subject to refund).

LECs'. Indeed, inaccuracy is inherent in forecasting, regardless of the methodology. To punish the LECs for the inaccuracy of their forecasts, when the Commission's forecasts are no better, would be inequitable.

- **No consumer benefit from refunds.** The refunds ordered by the Commission will go straight into the pockets of the IXCs; consumers will see no benefit. The rates consumers paid for long distance service reflected the access charges in effect at the time service was provided; the rates consumers will pay during the remainder of the tariff year will reflect the access charges in the tariffs that took effect on January 1. The IXCs will not pass through any refund to their customers, and they will not reduce their rates on account of those refunds. Refunds will simply benefit the IXCs' stockholders at the expense of the LECs' stockholders. Ironically, the only consumer benefit in all this flowed from the LECs' original allocation of the Common Line revenue requirement. If, as the Commission found, the LECs allocated too little of that revenue requirement to their EUCL charges, the multi-line business customers thereby benefited by paying lower EUCL charges.[17]

- **Claims by end users.** If the Commission once sets the precedent of requiring the LECs to refund the overcharges resulting from the allocation of the Common Line revenue requirement, nothing will preclude end users from claiming the LECs have allocated too much to the EUCL. The Commission

[17] Cf., In the Matter of Communications Satellite Corporation, Memorandum Opinion and Order, 2 FCC Rcd. 3706, 3716-17 ¶ 81 (1987) (in determining whether to order refunds of overstated rates for full period service, the Commission would

thus could face the possibility of resolving claims for refunds from both sides, as end users and IXCs both claim the LECs' methodologies allocated too much to their respective sides of the equation. Given the vagaries of forecasting, the LECs could face having to defend equally-reasonable claims from both sides.[18]

- **Other changes affecting LEC access revenues.** The Commission should also consider the impact of other Commission-ordered changes on the LECs' access revenues.[19] Specifically, the Commission has recently ordered changes to the price cap rules that will exert substantial downward pressure on access revenues and on the LECs' earnings.[20] Given the changes already wrought by the Commission, U S WEST believes the Commission should avoid imposing the additional impact of a refund obligation.

Given these factors, U S WEST believes the Commission cannot reasonably conclude that refunds are appropriate in this proceeding. The Commission should reconsider its decision to order refunds in this proceeding.

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consider consumer benefit attributable to artificially suppressed rates for occasional service).

[18] The answer, of course, is to do away with the forecasts altogether, as the LECs have advocated.

[19] Cf., Virgin Islands Telephone Corp., 989 F.2d at 1240 ("[P]rior to ordering a refund, the Commission will likely want to take into account changes in the market environment.")

[20] In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, End User Common Line Charges, CC Docket Nos. 96-262, 94-1, 91-213, 95-72, First Report and Order, 7 Comm. Reg. (P&F) 1209 (1997), appeals pending sub nom. Southwestern Bell Telephone Company v. FCC, Nos. 97-2618, et al. (8th Cir.).

II. THE COMMISSION SHOULD RECONSIDER ITS DECISION TO INCREASE THE EXOGENOUS COST ADJUSTMENT FOR EQUAL ACCESS COST RECOVERY TO REFLECT INTERVENING REVENUE GROWTH

Breaking with all prior precedent, the Commission ordered the price cap LECs to increase the exogenous cost change to remove the effects of equal access cost recovery from LEC rates[21] by the growth in revenues since the inception of price caps. In all previous, similar instances, the Commission had never ordered such an adjustment.

SBC seeks reconsideration of this determination; U S WEST supports that request.[22] As SBC notes,[23] the Commission's rules regarding exogenous cost changes make no mention of an "R" adjustment, and the Commission has never ordered the price cap LECs to make such an adjustment in the four prior proceedings in which it had an opportunity to do so.

[21] Id. at 1291 ¶ 314.

[22] SBC has not specifically asked the Commission to reconsider its decision to order refunds, even if the "R" value adjustment is appropriate. For the reasons set forth in Section I.B. of these Comments, the Commission should reconsider, on its own motion, its decision to order refunds on this account. Similarly, the Commission should reconsider, on its own motion, its decision to order refunds with respect to Other Billing and Collection issues. Memorandum Opinion and Order ¶ 207.

[23] SBC Petition at 3-4.

The Commission must provide a detailed, reasoned analysis to justify such a departure from past precedent,[24] and it has not done that. For this reason, the Commission should reconsider its decision to require an "R" adjustment.

Respectfully submitted,

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By: ______________________

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[24] See, Greater Boston Television Corporation v. FCC, 444 F.2d 841, 852 (D.C. Cir. 1970), pets. for reh'g denied and Opinion modified, cert. denied, 91 S.Ct. 2229 (1971) ("[A]n agency changing its course must supply a reasoned analysis indicating that prior policies and standards are being deliberately changed, not casually ignored.").

Attachment 1

FCC Autoregression With Additional Points (1997)

LN	ITEM	SOURCE	A PER LINE FORECAST DEPENDANT	B INDEPENDANT
1	1989 ACTUAL BFP PER LINE	ARMIS 43-01		
2	1990 ACTUAL BFP PER LINE	ARMIS 43-01		
3	1991 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$5.47	
4	1992 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$5.74	$5.47
5	1993 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$5.92	$5.74
6	1994 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$6.14	$5.92
7	1995 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$6.54	$6.14
8	1996 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$6.81	$6.54
9	1997 Actual BFP PER LINE(11Mo Actual 1 Mo Est)	Separations Records	$6.85	$6.81
10	INTERCEPT	See Note 1	0.792242741	
11	X VARIABLE 1	See Note 2	0.907879398	
12	1998 AUTOREGRESSION FORECAST	See Note 3	$7.01	$6.85
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	$6.93	
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	$6.56	
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	$0.37	
17	FCC ESTIMATE	1997 Direct Case Order	$7.38	
18	FCC estimate versus Autoregression with Additional Points	Ln 17 - Ln 14	$0.45	

NOTES:

1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs.
2 Excel SLOPE function using lines 3 - 9, Col A and B as inpu ts
3 Ln 10,Col A + (Ln 12, Col B * Ln 11, Col A)

Attachment 2

FCC Autoregression With Additional Data Points (1989-90, 97)

LN	ITEM	SOURCE	A	B		
			PER LINE FORECAST			
			DEPENDANT	INDEPENDANT	INCREASE/(DECREASE)	
1	1989 ACTUAL BFP PER LINE	Input For Lagged Regression	$5.50			
2	1990 ACTUAL BFP PER LINE	Input For Lagged Regression	$5.37	$5.50		
3	1991 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$5.47	$5.37	($0.13)	
4	1992 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$5.74	$5.47	$0.10	
5	1993 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$5.92	$5.74	$0.27	
6	1994 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$6.14	$5.92	$0.18	
7	1995 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$6.54	$6.14	$0.22	
8	1996 ACTUAL BFP PER LINE	FCC 97-403, Table A6	$6.81	$6.54	$0.40	
9	1997 Actual BFP PER LINE(11Mo Actual 1 Mo Est)	Input For Lagged Regression	$6.85	$6.81	$0.27	
10	INTERCEPT	See Note 1	-0.18303317			
11	X VARIABLE 1	See Note 2	1.059260168			
12	1998 AUTOREGRESSION FORECAST	See Note 3	$7.07	$6.85	$0.04	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	$6.96	**Average Increase**	$0.17	$0.21 Avg. Excl. (.13)
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	$6.56			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	$0.40			
17	FCC ESTIMATE	1997 Direct Case Order	$7.38			
18	FCC estimate versus Autoregression with Additional Points	Ln 17 - Ln 14	$0.42			

NOTES:

1 Excel INTERCEPT function using lines 1 - 9, Col A and B as inputs
2 Excel SLOPE function using lines 1 - 9, Col A and B as inputs
3 Ln 10, Col A + (Ln 12, Col B * Ln 11, Col A)

Attachment 3

STUDY AREA	LINES JUL-DEC	EUCL INCREMENT	EUCL UNDERBILLING	MOU JUL-DEC	CCL INCREMENT	CCL OVERBILLING
ARIZONA	4,056,259	$0.85	$3,461,876			
COLORADO	4,376,528	$0.99	$4,332,763			
IDAHO	735,733	$0.89	$657,390			
MONTANA	501,139	$0.93	$468,473			
NEW MEXICO	1,125,525	$0.98	$1,107,969			
UTAH	1,798,719	$0.81	$1,451,306			
WYOMING	395,577	$0.00	$0			
IOWA	1,734,907	$0.62	$1,073,281			
MINNESOTA	4,166,622	$0.70	$2,907,722			
NEBRASKA	851,110	$0.83	$702,807			
NORTH DAKOTA	353,552	$0.72	$254,541			
SOUTH DAKOTA	443,807	$0.75	$332,415			
IDAHO-PNB	44,110	$0.81	$35,565			
OREGON	2,017,870	$0.80	$1,607,356			
WASHINGTON	3,532,374	$0.71	$2,495,803			
TOTAL	26,133,832		$20,889,268	28,030,881,477	($0.000749)	($20,995,130)

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 21st day of January, 1998, I have caused a copy of the foregoing **COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served via first class United States Mail, postage pre-paid, upon the persons listed on the attached service list.

Rebecca Ward

Rebecca Ward

*Served via hand-delivery

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Last Update